

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-05-045

Summit Polymers, Inc.

160 Clarence Drive

Mount Sterling, KY 40232

September 20, 2006

Ralph E. Gosney, Reviewer

SOURCE I.D. #: 021-173-00024

SOURCE A.I. #: 3196

ACTIVITY #: APE20040001

**SOURCE DESCRIPTION:**

Summit Polymers is a manufacturer of small plastic parts for the automotive industry. Products include air conditioning/heating vent dampers and louvers, cup holders, etc. The source currently operates 30 injection molding machines that produce the various automotive parts. These parts are then trimmed, inspected, and assembled. The mold "tree" and some rejected pieces and parts are then ground and recycled back through the molding system. Some of the parts, depending upon the desired final product, are sent to a series of nine (9) paint booths. The paint booths consist of small, hand-held sprayers with cartridge filters that are replaced once per shift. Painted parts are cured in a small infrared oven attached to the paint booths.

**PUBLIC AND U.S. EPA REVIEW:**

On August 3, 2006 notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Mt. Sterling Advocate* in Mt., Sterling, Kentucky. The public comment period expired 30 days from the date of publication.

Three comments were received during this period from Eric Patterson, Regional Director of Manufacturing for Summit Polymer, Inc. The following section lists each comment with a response from the Division.

**COMMENTS AND RESPONSE:**

1. Page 2 of the permit states we have 28 injection molders. We in fact have 30 injection molders. A permit revision was sent in November 2005 to add these injection molders.

*Division's Response*

Comment acknowledged, and the permit revised as requested.

2. Page 5 section 4 c & d and section 5 b & c, refer to monitoring visible emissions and performing a method 9 test for opacity on baghouse filters for the paint booths. Our paint booths are not equipped with a baghouse filter.

*Division's Response*

Painting Operations were listed in permit F-98-020 as paint booths with filters and there was an operating limitation "The paint booth filters shall control particulate emissions and be operated properly in accordance with manufacturers' specifications and/or standard operating procedures at all times when painting is being performed." A low temperature fabric filter is listed in the emissions inventory system with a 99% control efficiency on particulates, that was approved by the facility. The word "baghouse" was replaced in the permit with the word "particulate". If the description or control efficiency is inaccurate, provide the Division with a manufacturer sheet on the control equipment and complete all sections of form DEP7007N for the painting operations.

3. Page 6 of the permit lists a parts washer as an insignificant activity. We do not have a parts washer.

*Division's Response*

Parts Washer was listed in permit F-98-020 as an insignificant activity. The parts washer was removed from the insignificant activities section in the permit.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.